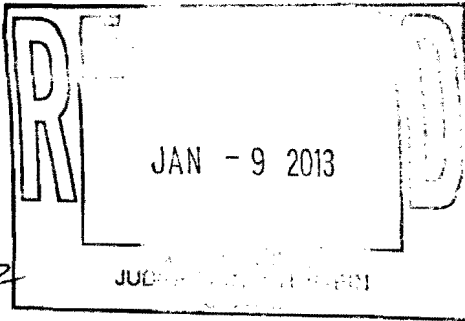


01/07/2013

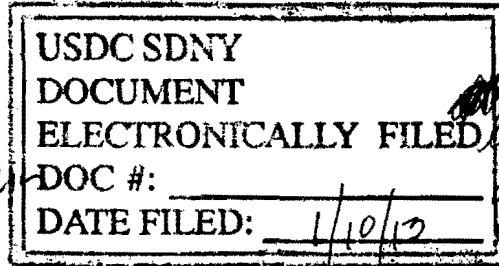
Mondher Bejaoui

PO BOX 329002

Brooklyn, NY 11232



To: Honorable Sidney Stein
500 Pearl Street
New York, NY 10007



MEMO ENDORSED

Re: United States v. Mondher Bejaoui
10 cr. 553 (SHS)

Application for:

- Compel government to disclose new evidence that will use at Trial
- Compel government to file a bill of particulars

Mondher Bejaoui
Defendant Pro se

Jan 10, 2013
Each of these matters requested in this letter was handled during the Jan. 8, 2013 court conference.
SO ordered
Sidney Stein
U.S.D.S.

01/07/2013

Mondher Bejaoui

63673-054 M-D-C

PO Box 329002

BROOKLYN, NY 11232

January 07, 2013

Honorable Sidney Stein

500 Pearl Street

New York, NY 10007

RE: United States v.

Mondher Bejaoui 10 cr 553 (SHS)

Dear Judge Stein:

PART 1

On 12/18/2012 I received a letter from Alexander J. Wislon / Kan M. Nawadny Assistant United States Attorneys dated 12/06/2012

In the second paragraph of the letter it stated that they are in possession of additional documents that they intend to use at trial and they will coordinate

page 1 of 5

01/07/2013

to make arrangements for me to inspect this new evidence.

Unfortunately, it is only (09) days left before the start of the trial (schedule for 01/16/2013) and the government has not made the necessary arrangement for me to inspect the materials

I, respectfully request that the court compel the government to disclose the new material that they have in their possession to afford me the opportunity to inspect this specified evidence and file application to object if after viewing the evidence I found it is necessary to object.

01/07/2013

PART II

On December 26, 2012, the court held a bail hearing at the end of the proceeding at, informed the court and made oral argument to renew a bill of particular request. Your honor ~~and~~ discussed the request with the government and stated that they will give me list of their exhibits early than required. But I have never received any exhibits or any material that could guide me to prepare for trial.

It is clear that the prosecutors are in mangameship mode and I will not have any notice of the charges. Therefore I respectfully ask the court to compel the government to produce the followings:

page 3 of 5

01/07/2013

- Particulars of the false representations alleged including particulars regarding the alleged applications to the plan and private insurers
- Identification of private insurers as part of identities of victims: The indictment identify the "NYAIP" and private insurers
- The indictment charge 18 USC 1341 and 2(a): Aiding and abetting: The defendant request the identities of the alleged aided and abetted persons (the identities of any alleged unindicted co-conspirator).

It is virtually impossible for me to investigate the allegations as to which I will have to prepare. The need of this information is particularly acute

01/07/2013

given my extensive and legitimate business dealings with a wide range of associates, sub-contractors, brokers and customers.

if the court wish that there is a need for me to file a memorandum of Law to compel the government to disclose the new evidence that they intent to use at trial and disclose the necessary particulars to prepare for my defense, then I will

dated: January 07, 2013

Respectfully submitted
Mandher Bejaoui
Mandher Bejaoui

page 5 of 5